

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 47, 145, 488 & 1706

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 19, 2022, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b) and (III) Granting Certain Related Relief* [D.I. 47] in the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. On November 23, 2022, the Court entered the *Interim Order (I) Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b) and (III) Granting Certain Related Relief* [D.I. 145].

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

3. On January 12, 2023, the Court entered the *Final Order (I) Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b) and (III) Granting Certain Related Relief* [D.I. 488] (the “Cash Management Order”).

4. On June 26, 2023, the Court entered the *Amended Final Order (I) Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b) and (III) Granting Certain Related Relief* [D.I. 1706] (the “Amended Cash Management Order”).

5. On December 27, 2023, the Debtors circulated a proposed second Amended Cash Management Order (the “Second Amended Cash Management Order”) to the Office of the United States Trustee (the “U.S. Trustee”) and the Official Committee of Unsecured Creditors appointed in these Chapter 11 Cases (the “Committee”).

6. A copy of the Second Amended Cash Management Order is attached hereto as **Exhibit A**. A copy of the Amended Cash Management Order compared against the Second Amended Cash Management Order is attached hereto as **Exhibit B**. The U.S. Trustee and the Committee have no objection to the entry of the Second Amended Cash Management Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Second Amended Cash Management Order shall be uploaded to CM/ECF.

7. Accordingly, the Debtors respectfully request that the Court enter the Second Amended Cash Management Order at its earliest convenience.

Dated: January 2, 2024
Wilmington, Delaware

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